

1 DAVID D. FISCHER, SBN 224900  
2 LAW OFFICES OF DAVID D. FISCHER, APC  
3 5701 Lonetree Blvd., Suite 312  
4 Rocklin, CA 95765  
5 Telephone: (916) 447-8600  
6 Fax: (916) 930-6482  
7 Email: david.fischer@fischerlawoffice.com

8 Attorney for Defendant  
9 ARNES KRAJINIC

10 **UNITED STATES DISTRICT COURT FOR THE**  
11 **EASTERN DISTRICT OF CALIFORNIA**

12 UNITED STATES OF AMERICA,

13 Case No.: 2:23-CR-00074-DJC

14 Plaintiff,  
15 v.

16 STIPULATION REGARDING  
17 EXCLUDABLE TIME PERIODS  
18 UNDER SPEEDY TRIAL ACT;  
19 FINDINGS AND ORDER

20 ARNES KRAJINIC,

21 Defendant.

22 DATE: August 31, 2023  
23 TIME: 9:00 a.m.  
24 COURT: Hon. Daniel J. Calabretta

25 **STIPULATION**

26 Plaintiff United States of America, by and through its counsel of record, and  
27 defendant, by and through defendant's counsel of record, hereby stipulate as follows:

- 28 1. By previous order, this matter was set for status conference on August 31, 2023.  
2. By this stipulation, the parties move to continue the status conference until  
October 5, 2023, and to exclude time through October 5, 2023, under Local Code T4.  
3. The parties agree and stipulate, and request that the Court find the following:  
a) The government has represented that the discovery associated with this case  
includes search warrants, photographs, audio recordings, and video recordings. This  
discovery has been either produced directly to counsel and/or made available for  
inspection and copying.

STIPULATION REGARDING EXCLUDABLE TIME  
PERIODS UNDER SPEEDY TRIAL ACT

1                   b) Counsel for defendant desires additional time to consult with his client  
2 regarding discovery and otherwise prepare for trial.

3                   c) Counsel for defendant believes that failure to grant the above-requested  
4 continuance would deny him the reasonable time necessary for effective preparation,  
5 taking into account the exercise of due diligence.

6                   d) The government does not object to the continuance.

7                   e) Based on the above-stated findings, the ends of justice served by continuing the  
8 case as requested outweigh the interest of the public and the defendant in a trial within  
9 the original date prescribed by the Speedy Trial Act.

10                  f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. §  
11 3161, et seq., within which trial must commence, the time period of August 31, 2023 to  
12 October 5, 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A),  
13 B(iv) [Local Code T4] because it results from a continuance granted by the Court at  
14 defendant's request on the basis of the Court's finding that the ends of justice served by  
15 taking such action outweigh the best interest of the public and the defendant in a speedy  
16 trial.

17                  4. Nothing in this stipulation and order shall preclude a finding that other  
18 provisions of the Speedy Trial Act dictate that additional time periods are excludable  
19 from the period within which a trial must commence.

20                  **IT IS SO STIPULATED.**

21                  Dated: August 30, 2023

/s/ David D. Fischer  
DAVID D. FISCHER  
Attorney for Defendant  
ARNES KRAJINIC

PHILLIP A. TALBERT  
US ATTORNEY

26                  Dated: August 30, 2023

/s/ Emily Sauvageau  
EMILY SAUVAGEAU  
Assistant United States Attorney

## ORDER

IT IS SO FOUND AND ORDERED this 30<sup>th</sup> day of August, 2023.

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA  
UNITED STATES DISTRICT JUDGE